## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF OHIO

In re: NANCY FORBUSH	)	CASE NO.: 17-13859
	)	
	)	Chapter 13
Debtor.	)	
	)	JUDGE ARTHUR I. HARRIS
	)	
	)	
	)	RESPONSE TO TRUSTEE'S
	)	MOTION TO DISMISS CASE

Now comes the Debtor, Nancy Forbush, by and through counsel, to hereby respectfully requests this Honorable Court deny the Trustee's Motion to Dismiss Case for Lack of Funding.

Debtor is currently considering her options and may convert her case to a Chapter 7. Debtor wishes that this matter be heard on the merits.

Wherefore, based upon the foregoing, the Debtor prays that the Trustee's Motion is denied.

Respectfully Submitted,

## AMOURGIS & ASSOCIATES

/s/ Lisa M. Lahrmer

Lisa M Lahrmer (0082089) Attorney for Debtor

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## **CERTIFICATE OF SERVICE**

I certify that on October 2, 2018 a true and correct copy of the foregoing was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Lauren A. Helbling, Chapter 13 Trustee

Lisa M. Lahrmer, Attorney for Debtor

Cleveland Office of the United States Trustee, on behalf of Daniel M. McDermott, United States Trustee, at the registered address of the US Trustee @ USDOJ.gov established with the bankruptcy court.

And by regular U.S. mail, postage prepaid:

Debtor: Nancy Forbush, 41530 State Route 18, Wellington, OH 44090

/s/ Lisa M. Lahrmer Lisa M. Lahrmer (0082089) Attorney for Debtor